

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

v.

ROGER MERCEDES

Defendant.

Criminal Action No. 18-

13-UN
FILED
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INFORMATION

The Acting United States Attorney for the District of Delaware charges that:

Count One

**Conspiracy to Commit an Offense Against the United States
(18 U.S.C. § 371)**

1. From on or about November 8, 2017 through on or about November 9 2017, in the District of Delaware and elsewhere, the defendant,

ROGER MERCEDES,

did knowingly and willfully combine, conspire, confederate, and agree with **KEITH LENDOF, ANGEL CESAR,** and **RED PICHARDO** to commit an offense against the United States, that is, to knowingly and willfully convert to their own use, money belonging to the United States, the value of which exceeded \$1,000, that is, Drug Enforcement Administration ("DEA") funds, in violation of Title 18, United States Code, Section 641.

Purpose and Object of the Conspiracy

2. It was the purpose and object of the conspiracy for **ROGER MERCEDES, KEITH LENDOF, ANGEL CESAR, AND RED PICHARDO** to unjustly enrich themselves by obtaining money in exchange for fake "sham" cocaine, which they purported was real cocaine with a value in excess of \$137,000.

Manner and Means of the Conspiracy

The manner and means by which the defendants sought to accomplish the purpose and object of this conspiracy included, among other things, the following:

3. **ROGER MERCEDES**, believing a confidential informant ("CI") working with the DEA to be a legitimate drug dealer, offered the CI five (5) kilograms of cocaine in exchange for \$137,500 in cash. The cocaine, which **ROGER MERCEDES** represented was real cocaine, was in actuality sham cocaine, which **ROGER MERCEDES, KEITH LENDOF, ANGEL CESAR, AND RED PICHARDO** knew.

4. **ROGER MERCEDES** enlisted the help of **KEITH LENDOF, ANGEL CESAR, AND RED PICHARDO** to travel with him to Delaware and to assist in the sale of the sham cocaine to the CI in exchange for \$137,500 in cash.

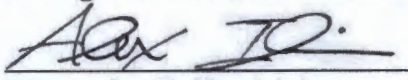
Overt Act

In furtherance of the conspiracy, at least one of the co-conspirators committed and caused to be committed, in the District of Delaware, at least the following overt act, among others:

5. On November 9, 2017, **RED PICHARDO** knowingly drove a rented Ford Explorer into the District of Delaware carrying kilograms of sham cocaine.

All in violation of Title 18, United States Code, Section 371.

DAVID C. WEISS
Acting United States Attorney

BY: 
Alexander P. Ibrahim
Assistant United States Attorney

Christopher de Barrena-Sarobe
Special Assistant U.S. Attorney

DATED: February 20, 2018